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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	13 Civ. 3028 (WHP)
- v. -	:	
	:	
ALL ASSETS OF CARTAGENA	:	
INTERNATIONAL, et al.,	:	
Defendants <i>in rem</i> .	:	
	:	
-----	X	

NOTICE OF CONSENT MOTION TO STAY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Government's Consent Motion to Stay the Above-Captioned Action and the related *Ex Parte* Sealed Submission in Support of Such Motion, the United States of America, with the consent of all parties in this action, will move before the Honorable William H. Pauley

III, United States District Judge for the Southern District of New York, at such time as the Court shall direct, to stay this action pursuant to Title 18, United States Code, Section 981(g)(1) and in the interest of judicial economy, and such other relief as the Court may determine to be just and proper.

Dated: New York, New York
September 13, 2013

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for the Plaintiff
United States of America

By: /s/ Jason H. Cowley
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